

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|-----------------------------|---|-------------------------|
| In re: |) | |
| |) | Chapter 11 |
| JOANN INC., ¹ |) | |
| |) | Case No. 25-10068 (CTG) |
| Post-Effective Date Debtor. |) | |
| |) | |

**CONSENT ORDER APPROVING STIPULATION REGARDING
CLAIMS OF JONES LANG LASALLE AMERICAS, INC.**

Pursuant to and in accordance with the *Stipulation Regarding Claims of Jones Lang LaSalle Americas, Inc. Claims* (the “Stipulation”)² attached hereto as **Exhibit 1**, and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the Court under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief set forth herein is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and with the consent of the Parties; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Stipulation.

1. The Stipulation is approved and the terms of the Stipulation are hereby made effective by this Consent Order.

2. Sufficient notice of this Consent Order has been provided and the requirements of Rule 3007 of the Federal Rules of Bankruptcy Procedure and any applicable local rules of this Court are otherwise satisfied.

3. Notwithstanding any applicable rules to the contrary, this Consent Order shall be immediately binding and enforceable upon its entry.

4. The Plan Administrator is authorized to take all actions necessary to effectuate the relief granted in this Consent Order.

5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Consent Order.

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|-----------------------------|---|-------------------------|
| In re: |) | |
| |) | Chapter 11 |
| JOANN INC., ¹ |) | |
| |) | Case No. 25-10068 (CTG) |
| Post-Effective Date Debtor. |) | |
| |) | |

**STIPULATION REGARDING
CLAIMS OF JONES LANG LASALLE AMERICAS, INC.**

Ann Aber, solely in her capacity as the plan administrator (the “Plan Administrator”) appointed in the above-captioned case, and Jones Lang LaSalle Americas, Inc. (“JLL” and collectively with the Plan Administrator, the “Parties”), by and through their undersigned counsel, hereby state, agree, and stipulate (the “Stipulation”) as follows:

1. On April 4, 2025, JLL filed Proof of Claim No. 11752 (“Claim 11752”). Claim 11752 asserted an administrative expense claim under 11 U.S.C. § 503(b)(9) in the amount of \$149,817.63 (the “503(b)(9) Claim”), a postpetition administrative expense claim for the period of January 15, 2025 (the “Petition Date”) through February 26, 2025, in the amount of \$822,942.42 (the “First Administrative Expense Claim”), and a general unsecured claim in the amount of \$2,616,620.70 (the “GUC Claim”).

2. On June 30, 2025, the debtors in the above-captioned case filed *Debtors’ Ninth Omnibus Objection to Certain Claims* [Docket No. 1317] (“Ninth Omnibus Objection”) seeking to reclassify the 503(b)(9) Claim, in its entirety, as a general unsecured claim.

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3. On August 6, 2025, JLL filed Proof of Claim No. 19789 (“Claim 19789”) asserting a supplemental postpetition administrative expense claim in the amount of \$719,698.10 (the “Supplemental Administrative Expense Claim” and together with the First Administrative Expense Claim, the “Administrative Expense Claims”).

4. Since the filing of the First Administrative Expense Claim, certain post-petition amounts due JLL that were reflected in the Administrative Expense Claims were paid by the Debtors in the ordinary course of business.

5. JLL and the Plan Administrator have since engaged in good-faith negotiations regarding the remaining amounts due under the Administrative Expense Claims and the 503(b)(9) Claim and have agreed to resolve such claims upon the terms and conditions set forth herein.

6. With respect to the Administrative Expense Claims:

(a) The remaining amounts due under the Administrative Expense Claims are and shall be deemed allowed in the collective amount of \$639,772.55 (the “Allowed Administrative Expense Claim”).

(b) Upon payment of the Allowed Administrative Expense Claim in full, without any further filing by any Party or order of the Court, (i) the First Administrative Expense Claim asserted in Claim 11752 shall be deemed satisfied and withdrawn in its entirety, with prejudice; and (ii) \$176,217.72 of the Supplemental Administrative Expense Claim asserted in Claim 19789 shall be reclassified as a general unsecured claim, with the remainder of the Supplemental Administrative Expense Claim being deemed satisfied and withdrawn, with prejudice.

7. With respect to the 503(b)(9) Claim:

(a) The 503(b)(9) Claim is and shall be deemed allowed in the amount of \$142,358.95 (the “Allowed 503(b)(9) Claim”).

(b) Upon payment of the Allowed 503(b)(9) Claim in full, without any further filing by any Party or order of the Court, (i) \$7,458.68 of the 503(b)(9) Claim shall be reclassified as a general unsecured claim, with the remainder of the 503(b)(9) Claim being deemed satisfied and withdrawn, with prejudice; and (ii) the Ninth Omnibus Objection, solely as it relates to the 503(b)(9) Claim, shall be deemed withdrawn.

8. Nothing contained in this Stipulation shall constitute the allowance of or disallowance of the remaining general unsecured claims of JLL, which shall be resolved separately in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and any further orders of the Court.

9. Upon the Plan Administrator providing notice to Kroll Restructuring Administration (“Kroll”) that the Allowed Administrative Expense Claim and the Allowed 503(b)(9) Claim have been satisfied, Kroll, as the claims and noticing agent in the above-captioned case, is authorized to revise the official claims register to reflect the terms of this Stipulation.

STIPULATED and AGREED:

[Signature Page Follows]

Dated: December 29, 2025
Wilmington, Delaware

/s/ Ronald Gellert

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